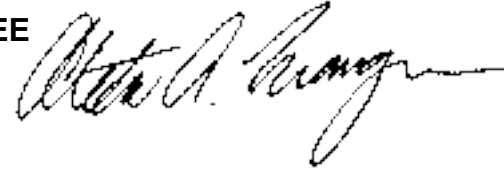


UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.



UNITED STATES OF AMERICA)
)
 v.)
)
 WILLIAM M. WORTHY II (2), et al)

No. 3:13-00119-2
JUDGE TRAUGER

**MOTION AND INCORPORATED MEMORANDUM TO CONTINUE TRIAL AND
EXTEND DEADLINE FOR PRETRIAL MOTIONS**

Undersigned counsel for Defendant (2) William M. Worthy II, respectfully moves this Honorable Court to extend the time within which to file pre-trial motions, and to continue the trial date now set for October 1st, 2013. In moving for this continuance, counsel notes that the three co-defendants in this matter have also filed motions to continue the trial date and to extend filing deadlines (Docket Nos. 42, 43, 44). Undersigned counsel and Mr. Worthy do not object to a continuance, and further aver that a continuance of the trial is in the interests of justice and necessary for effective assistance of counsel.

In support of this Motion, counsel notes the following:

1. Mr. Worthy's initial appearance was on July 22nd, 2013; the Office of the Federal Public Defender had a conflict of interests and undersigned counsel was thus appointed as a member of the Criminal Justice Act Panel (Docket No. 26). Undersigned counsel has therefore had this case for just six (6) weeks. The Court's Order setting the case for trial on October 1st, 2013 is the first setting of the case for trial (Docket No. 35).

2. Assistant United States Attorney Sandra Moses has advised counsel for all co-defendants that the Government does not object to the co-defendants' motions for a continuance of the first trial setting and extension of deadlines.